From: "Hood, Lynne" <Hood.Lynne@epa.gov>
To: "Piper M Goessel" <kgoessel@fs.fed.us>
"Porter, Valerie" <valerie.porter@aecom.com>
Date: 3/20/2018 9:47:40 AM
Subject: Comment on Response to Comments hydro model
Attachments: Appendix B.pdf

Hi Piper, below is our input regarding the response to our comment related to water quality. As I understand, this issue is also a topic that the USFS and AECOM will be tracking and addressing.

Thank you for the responses to comments on the hydrologic model. The responses are helpful and provided clarifying information.
One of our comments #6 raises questions about water chemistry. The response identifies that this will be addressed in the SWWC. The response also states that "Short-term analysis related to peak or low streamflows is not the objective of the SWWC model. Rather, the model is designed to assess the general magnitude of potential system changes in response to long-term actions related to mining activities relative to current conditions."

The EIS should disclose impacts to water quality based on best case, base case, and reasonable worst case as well as the probability of the predicted outcomes, freqency, and phase of project/timeframe of impact. The effects will be compared to meeting water quality standards and for any permit decisions. Therefore, we need to understand magnitude, frequency, and duration. The SWWC only provides magnitude. We request continuous simulation modeling of the system to accomplish an effects analysis based also on frequency and duration. ID chronic aquatic life standards are pretty explicit about this.

The provision contained at IDAPA 58.01.02.210.03.d.**i.** states the following (highlighted for clarity):

58.01.02.210.03.d. Application of toxics criteria.
i. Frequency and duration for aquatic life toxics criteria. Column B1 criteria *(acute criteria)* are concentrations not to be exceeded for a one-hour average more than once in three (3) years. Column B2 criteria *(chronic criteria)* are concentrations not to be exceeded for a four-day average more than once in three (3) years.

The link to Idaho's WQS :

https://adminrules.idaho.gov/rules/current/58/0102.pdf

We recommend utilizing a similar approach to the Idaho Cobalt Project as presented in the final EIS. Attached is the Appendix B, *Surface Water and Groundwater Flows and Predicted Water Quality,* as an example of the method and format.

Thank you and Please let me know if you have any questions.
Lynne

Lynne Ann Hood
Environmental Scientist, NEPA Review
EPA R10- Idaho Operations Office
950 W Bannock Street, Suite 900
Boise, Idaho 83702

Phone: 208-378-5757